

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF OHIO**  
**EASTERN DIVISION**

<b>In Re:</b>	)	<b>CHAPTER 7 Proceedings</b>
	)	
<b>MATTHEW M. MOTIL</b>	)	<b>Case No. 22-10571</b>
	)	
	)	
<b>Debtor(s)</b>	)	<b>Judge: ARTHUR I. HARRIS</b>
	)	
	)	

**MOTION FOR AUTHORITY TO SELL PROPERTY FREE AND CLEAR OF LIENS, CLAIMS  
AND ENCUMBRANCES WITH NOTICE TO CREDITORS AND NOTICE OF  
OPPORTUNITY TO OBJECT**

Now comes Trustee Virgil E. Brown, Jr., by and through counsel, and pursuant to Bankruptcy Rules 6004(c), 2002(a),(c),(1) and 11.U.S.C. §363(b) and (f), respectfully moves this Honorable Court for an Order authorizing the Trustee to sell the Estate's interest in the following described property, free and clear of all liens, claims and encumbrances:

Debtor's interest in items of jewelry including a watch.

There are believed to be no mortgages, encumbrances or liens against said property.

It would be in the best interest of this Estate to sell the said property at public or private sale, free and clear of all liens, claims, encumbrances or other interests of any creditors or other parties in interest in this Estate at the earliest practicable time.

The attached Purchase Agreement is the highest and best offer now available to the Estate. The purchase price is \$9,000.00.



August 31, 2022

Virgil E. Brown, Jr.

4070 Mayfield Road

South Euclid, OH 44121

Price to purchase Rolex Sea-Dweller, reference 116660, serial number G906980, would be \$9,000.00.

The shipping cost to send the above watch to the final buyer is \$75.00.

Thank you,

Jessica Greenberg

**WHEREFORE**, Movant prays that this Court grant this Motion for Authority to Sell and enter its Order pursuant to 11 U.S.C. §363(b) and §363(f) as follows:

1. Authorizing and directing this Movant to sell the Estate's interest in the subject property, to accept, implement and complete the purchase agreement, to retain and pay an escrow agent and the usual and customary escrow and closing costs, fees and expenses free and clear of all liens, encumbrances, claims, and interest,.
2. Requiring that the creditors and all parties in interest served with this Motion set forth Their interests, if any, in and to said real property of this Estate or be forever barred from asserting same;
3. Providing that any claims which may be asserted or which may be assertable be ordered transferred to the proceeds of sale pending subsequent judicial determination as to validity and priority, subject to the actual and necessary costs of administration as may be approved by this Court; and
4. For such other and additional relief as may be just an equitable.

Respectfully submitted,

/s/ Virgil E. Brown, Mr.

Virgil E. Brown, Jr.

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## CERTIFICATION OF SERVICE

A copy of the foregoing Motion was served by regular U. S. Mail, postage prepaid, this 14 day of October, 2022, to the following:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

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Thomas W. Coffey, Esq., at [tcoffey@tcoffeylaw.com](mailto:tcoffey@tcoffeylaw.com)

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All parties on attached Exhibit.

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Case 22-10571-aih  
Northern District of Ohio  
Cleveland  
Fri Oct 14 15:43:17 EDT 2022

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